



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SECRETARY

June 27, 2014

Mr. Shawn Garvin
Regional Administrator
U.S. Environmental Protection Agency, Region III
1650 Arch Street (Mail Code: 3RA00)
Philadelphia, PA 19103-2029

Dear Mr. Garvin:

Enclosed for your approval is a revision to the Philadelphia County Portion of the Commonwealth of Pennsylvania's State Implementation Plan (SIP). This SIP revision pertains to the source-specific Reasonably Available Control Technology (RACT) determination for seven heaters at Philadelphia Energy Solutions Refining and Marketing LLC (PES) in Philadelphia (formerly Sunoco Philadelphia Refinery) for the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS). This SIP revision is being submitted to the U.S. Environmental Protection Agency (EPA) for approval in accordance with Section 110 of the Clean Air Act, 42 U.S.C.A. § 7410.

On April 17, 2013, Philadelphia Air Management Services (AMS) submitted a letter to EPA committing to submit additional SIP revisions to provide source-specific RACT determinations for certain major sources of volatile organic compounds and oxides of nitrogen in Philadelphia County and a certification that source-specific RACT controls previously adopted under the 1-hour ozone NAAQS for the remaining sources continue to adequately represent RACT for the 1997 8-hour ozone NAAQS. The commitment resulted in EPA's conditional approval of Philadelphia County's 1997 8-hour ozone RACT demonstration (78 FR 75902; December 13, 2013). The enclosed SIP submittal concerning the "updated RACT determination/RACT plan approval" for seven heaters at PES is the first of several source-specific RACT SIP revisions that AMS will forward to DEP for processing and submittal to your agency.

Philadelphia AMS is part of a local health agency that is provided its enabling authority by Title 3, Air Management Code, whose powers and duties include the enforcement of laws relating to public health within the City of Philadelphia.

I have enclosed one hard copy and one compact disc copy of the entire submittal. The SIP revision includes the Plan Approval Application, RACT analysis, proof of publication, the *PA Bulletin* notice, notification to neighboring states, the public hearing transcript, the comment and response document, the Plan Approval, and Statement of Basis. I certify that the electronic files are exact duplicates of the hard copies.

The Commonwealth followed all of the applicable procedural requirements of the Commonwealth's laws and constitution in conducting and completing the adoption/issuance of the SIP revision.

Thank you for your attention to this matter. Should you have any questions concerning this SIP revision, please contact Joyce E. Epps, Director of the Bureau of Air Quality, by e-mail at jeepps@pa.gov or by telephone at 717.787.9702. You may also contact Thomas Huynh, Director, Air Management Services, Philadelphia Department of Public Health, by e-mail at thomas.huynh@phila.gov or by telephone at 215.685.7584.

Sincerely,

A handwritten signature in cursive script, appearing to read "E. Christopher Abruzzo".

E. Christopher Abruzzo
Secretary

Enclosures